

From on or about July 07, 2024, through on or about November 17, 2024, in
the Houston Division of the Southern District of Texas,

DARREN RUFFINS
and
WALTER TOLBERT

defendants herein, did unlawfully conspire to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully conspire to take and obtain the property of Verizon located at 6125 Telephone Rd., Total Wireless located at 11023 Fuqua St., Cricket Wireless located at 5025 Telephone Rd., and T-Mobile located at 10150 Almeda Genoa Rd., all located in Houston, which property was in the possession and custody of an employee of the named businesses, namely, United States Currency and cellular telephones, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, § 1951(a).

COUNT TWO

Title 18, United States Code, § 1951(a) and 2- Aiding and Abetting Interference with Commerce by Robbery

On or about July 07, 2024, in the Houston Division of the Southern District of Texas,

DARREN RUFFINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of Verizon located at 6125 Telephone Rd., Houston, Texas, which was in the possession and custody of an employee of Verizon, namely, United States Currency and cellular telephones, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT THREE

Title 18, United States Code, §§ 924(c)(1)(A) (ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about July 07, 2024, in the Houston Division of the Southern District of Texas,

DARREN RUFFINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT FOUR

Title 18, United States Code, §§ 1951(a) and 2- Aiding and Abetting Interference with Commerce by Robbery

On or about October 09, 2024, in the Houston Division of the Southern District of Texas,

DARREN RUFFINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully attempt take and obtain the property of Total Wireless located at 11023 Fuqua St., Houston, Texas, which was in the possession and custody of an employee of Total Wireless, namely, United

States Currency, and cellular telephones, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT FIVE

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about October 09, 2024, in the Houston Division of the Southern District of Texas,

DARREN RUFFINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT SIX

Title 18, United States Code, §§ 1951(a) and 2- Aiding and Abetting Interference with Commerce by Robbery

On or about November 02, 2024, in the Houston Division of the Southern District of Texas,

DARREN RUFFINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of Cricket Wireless located at 5025 Telephone Rd., Houston, Texas, which was in the possession and custody of an employee of Cricket Wireless, namely, United States Currency and cellular telephones, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT SEVEN

Title 18, United States Code, §§ 924(c)(1)(A) (ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about November 02, 2024, in the Houston Division of the Southern District of Texas,

DARREN RUFFINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did knowingly brandish a firearm, namely, a handgun, during and in relationship to

a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT EIGHT

Title 18, United States Code, §§ 1951(a) and 2- Aiding and Abetting Interference with Commerce by Robbery

On or about November 17, 2024, in the Houston Division of the Southern District of Texas,

DARREN RUFFINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of T-Mobile located at 10150 Almeda Genoa Rd., Houston, Texas, which was in the possession and custody of an employee of T-Mobile, namely, United States Currency and cellular telephones, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT NINE

Title 18, United States Code, §§ 924(c)(1)(A) (ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about November 17, 2024, in the Houston Division of the Southern District of Texas,

DARREN RUFFINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

A TRUE BILL:

Original Signature on File

FOREMAN OF THE GRAND JURY

NICHOLAS J. GANJEI
United States Attorney

BY: Benjamin J. Smith
Benjamin Smith
Special Assistant United States Attorney